FERC ONLINE GUIDELINES (eRegistration, Paper Filing, eFiling, eService)

eRegistration

- 1. **Who should eRegister:** The Commission's eRegistration system is now the principal method for identifying all persons involved in submitting filings to FERC, whether those filings are submitted electronically or on paper or other media. The following persons should have a complete and validated eRegistration account if they will engage in any of the following interactions with FERC:
 - a. any person logging on to the eFiling system to submit a document;
 - b. any person who will be entered as a contact on the service list for an applicant, whether the application is filed on paper or electronically;
 - c. any person who will be listed on a service list as either a primary person/counsel of record or as an other contact for an intervenor;
 - d. anyone who downloads email addresses from a web service list;

Persons without Internet access should include a statement in any filing they submit that they do not have Internet access.

- 2. **Validation:** To eRegister for the above activities, ensure that the eSubscription Only box is unchecked and that you complete all required (*) fields. After saving the eRegistration information, the system will send an email to the eRegistered email address. You must click on the link in that email to activate the account.
- 3. **Representative Organizations:** If you specified any Representative Organizations during the registration process, or subsequent editing, please delete these organizations. The only organization name you should enter is the one you select immediately after entering your name. It should be the organization you are employed by (or Individual if you will be acting on your own behalf). There is a system problem with representative organizations that results in inaccurate eLibrary index information.
- 4. **Updating an eRegistration Account:** Persons with an eRegistration account should update their account to reflect changes in physical address, email address and other changes in their profile information. Each person should have only one active account, identified by a unique FERC Online ID number.

If a registered user's email address changes, and the y wish to preserve links to existing service lists and eSubscriptions, the user should should edit the username (email address) and password in their existing account instead of creating a new account. This ensures that all service lists with entries linked to the FERC Online ID for the account are updated to reflect the new email address.

If a registered user changes organizations and no longer needs to preserved links to existing service lists and eSubscriptions, they should create a new account at the new organization. The former organization or law firm should file a Request to Change Service List to update the contacts for clients that were represented by the former employee or attorney.

Paper Filing

- 5. **eRegistration of Contacts:** The contacts for an Applicant should have validated eRegistration accounts, whether the application is submitted on paper or not. This will ensure that the email addresses of the contacts for the applicant appear on the service list.
- 6. **Motions to Intervene:** If you have Internet access, you should eFile all Motions to Intervene. The system is designed to automatically add to the service list the party(ies) and contact(s) you enter on the eFiling screens.

eFiling

- 7. **Public vs. Non-Public documents:** The eFiling system is still limited to public documents. Users may attach up to 10 files per submission and each file has a limit of 10 Mb. You may zip up to 10 files into a single file to simplify file selection and upload, provided that none of the 10 files are larger than 10 Mb.
- 8. **Adobe Acrobat files:** Scanned documents using early versions of Acrobat may not upload properly. We recommend that you file in text searchable PDF or an alternative format if possible. Used scanned documents only where there is no other alternative.
- 9. **New Filing Type:** Testimony is now a "qualified document" eligible for eFiling. Order No. 653 clarified the procedures for certification, notarization, and verification for eFiled testimony.
- 10. **File Name Constraints (Select File step):** File names cannot exceed 25 characters, including the extension. File names should only contain letters and numbers. The underscore symbol is permitted, but you must not include spaces, hyphens, or other special characters in a file name. If you need to rename a file, you should do so before the browse/select/attach process. Changing the path and/or file name after selection will negate the link to the file on your system and will result in the submission of a zero byte file that FERC cannot process.
- 11. **Time of Filing:** The date and time of submission is determined when you click on Upload Files after attaching the file(s) you're submitting. There are additional screens that you must complete and a mandatory "checkout" step at the end of the filing process.

Completion of the steps after you upload files will not impact the time of submission established in that step. Failure to do so will negate your submission.

12. **Filing Party:** The new eFiling release (v6.0) is designed to capture all of the information that should go on the service list for motions to intervene, including all parties and eRegistered contacts for joint and several motions to intervene. When eFiling a motion to intervene, the Filing Party is the name of the organization that should appear on the service list as a party. It is not the law firm filing on behalf of the party. This is also true for all other filings. Query, select, and add the party or parties on whose behalf you are filing. For multi-party filings, use the Add icon to build a table of parties.

Select the radio button "For an Individual" if you are filing on your own behalf as an Individual.

13. **Primary Person/Counsel of Record:** All email addresses entered on this screen must be eRegistered and validated with FERC Online. The Primary Person/Counsel of Record is the person or persons that will be designated as primarily responsible for a filing and its content. The Primary Person may be the signer(s) or another person(s) designated within the document as a representative of the party. Each party must have at least one primary representative contact. You may enter more than one representative for a party. For multi-party filings, the contacts do not need to be tha same for all parties.

If you are filing as an Individual (or on behalf of a person filing as an Individual), enter the eRegistered email address for that person.

- 14. **Other Contact:** Other Contacts are persons who are not the legal representative of the Filing Party but are involved in the proceeding and should be served with issuances by the Commission and documents filed by parties. This is an optional screen; you do not have to enter an "Other Contact." But any email address entries you do make must eRegistered and validated with FERC Online.
- 15. **Submission Description:** The submission description is added to the index information for a filing in eLibrary. Users should modify the default description displayed near the end of the filing process to more accurately describe the document submitted. We encourage separate filing of motions to intervene and substantive comments or protests. If you combine such filings or include other motions in the document, you should amend the description to fully describe the content of the document.
- 16. **Checkout:** Filers must click on the Submit Filing link on the Summary screen in order to complete the electronic submission process. Otherwise, the filing is negated. If you notice a significant error on the Summary screen, you will have to cancel and restart the process. You will not be able to use the Back button to return to the Select Files screen.

eService

- 17. Clarification of Service Requirements for Parties to Proceedings: The general rule in 18 CFR §385.2010 requires that any participant filing a document in a proceeding must serve a copy of that document on each person whose name is on the official service list for the proceeding and any other person required to be served under Commission rule or order or under law. The following exceptions apply:
 - a. Motions to Intervene and other pleadings filed on or before the comment deadline must be served on the Applicant. Such timely filings do not need to be served on parties, since the service list is "under construction" during the comment/intervention timeframe.
 - b. Comments filed in PL, RM, and AD dockets do not require service on other commenters. The Commission maintains a service-list-like list of commenters for these docket types because commenters are afforded the same rights as parties intervening in other types of proceedings.
- 18. **When is Intervention Necessary:** The Commission maintains service lists at the root (-000) subdocket level. One a party intervenes in a proceeding, they become a participant in the proceeding. It is not necessary for the same party to intervene again in a compliance phase (new subdocket) of the same proceeding. In certain cases, the Commission allows timely intervention in a complance phase of a proceeding, but this pertains to parties that have not previously intervened in the docket.

19. How documents may be served electronically:

- a. For issuances, the Commission will send eRegistered contacts an email with a link to the issuance in eLibrary and will mail a paper copy to contacts with only a postal address on the service list. Contacts who are not eRegistered are denoted by a ** before the name of the contact.
- b. For submittals that must be served:
 - 1. a document can be eServed whether it is a document eligible for eFiling or not.
 - **2.** For eFiled documents, the Confirmation of Receipt email or the Acceptance for Filing email can be forwarded to eRegistered contacts on the service list. Both have links to the filing.
 - **3.** For documents that are not eFiled, eService can be via email with a link to the document in the Commission's eLibrary system or a link to the document on the law firm's or party's web site.
 - **4.** Service to persons without email addresses will be by postal mail or other agreed upon method.

20. Contacts:

- a. For procedural questions and assistance with eRegistration, eFiling, or eService, contact FERCOnlineSupport@ferc.gov, or call (toll-free) 1-866-208-3676.
- b. To report problems or to correct errors in filing, contact <u>eFiling@ferc.gov</u>, or call 202-502-8258.